

EXHIBIT B

Option 1: Corrected Cost Five-Year Cost Projections:

Kessler's 1-Year Corrected Cost: \$346,479,168

Less Combined County Settlements: \$346,479,168 – \$19,770,073¹ = \$326,709,095

Less Prescribers' Responsibility: $\frac{\$326,709,095}{2} = \$163,354,547$

<u>Option 1's Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County²</u>	<u>Trumbull County</u>
Walgreens:	\$13,612,008	\$17,752,065
Walmart:	\$2,233,220	\$2,912,448

<u>Option 1's Red-Flag Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$13,399,320	\$17,474,689
Walmart:	\$638,063	\$832,128

¹ Plaintiffs provided Defendants with estimated ranges they would receive from their settlements with opioid manufacturers and distributors. In fairness to both parties, Defendants selected the mid-point for each of those ranges and incorporated those figures in here and throughout the Defendants' proposals.

² Here and throughout Defendants' proposals, Defendants allocate funding to each county based on the percentage that County would receive under Dr. Alexander's uncorrected 5-year abatement plan proposal. Therefore, Defendants allocate 56.6% of the ordered total to Trumbull County and 43.3% to Lake County.

Option 2 Eliminating Most Remote Relief:

Proximate Relief 1-Year Costs: \$501,810,002

Less Combined County Settlements: \$501,810,002 – \$19,770,073 = \$482,039,929

Less Prescribers' Responsibility: $\frac{\$482,039,929}{2} = \$241,019,964$

<u>Option 2's Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$20,083,712	\$26,192,122
Walmart:	\$3,294,984	\$4,297,145

<u>Option 2's Red-Flag Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$19,769,904	\$25,782,870
Walmart:	\$941,424	\$1,227,756

Option 3: OUD Population Correction:

Proximate Relief 1-Year Costs: \$521,663,451

Less Combined County Settlements: \$521,663,451 – \$19,770,073 = \$501,883,378

Less Prescribers' Responsibility: $\frac{\$501,883,378}{2} = \$250,946,689$

<u>Option 3's Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$20,910,886	\$27,270,879
Walmart:	\$3,430,692	\$4,474,129

<u>Option 3's Red-Flag Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$20,583,153	\$26,844,771
Walmart:	\$3,430,692	\$4,474,129

Option 4: Eliminating Projected Costs Not Attributable to Prescription Opioids:

Proximate Relief 1-Year Costs: \$864,558,347

Less Combined County Settlements: \$864,558,347 – \$19,770,073 = \$844,788,274

Less 35% \$844,788,274 - \$295,675,895.82 = \$549,112,378

Less Prescribers' Responsibility: $\frac{\$549,112,378}{2} = \$274,556,189$

<u>Option 4's Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$22,878,218	\$29,836,570
Walmart:	\$3,753,458	\$4,895,062

<u>Option 4's Red-Flag Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$22,520,746	\$29,370,374
Walmart:	\$1,072,416	\$1,398,589

Option 5: Plaintiffs' Uncorrected Projections:

Proximate Relief 1-Year Costs: \$864,558,347

Less Combined County Settlements: \$864,558,347 – \$19,770,073 = \$844,788,274

Less Prescribers' Responsibility: $\frac{\$844,788,274}{2} = \$422,394,137$

<u>Option 5's Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$35,197,259	\$45,902,416
Walmart:	\$5,774,550	\$7,530,865

<u>Option 5's Red-Flag Market Share Allocation:</u>		
<u>Pharmacy</u>	<u>Lake County</u>	<u>Trumbull County</u>
Walgreens:	\$34,647,301	\$45,185,190
Walmart:	\$1,649,871	\$2,151,676